



October 31, 2014

Ms. Gina McCarthy, Administrator  
Environmental Protection Agency  
Attn: Robert Heiss, Director  
Office of Enforcement and Compliance Assurance  
Office of Federal Activities  
International Compliance Assurance Division  
Ariel Rios Bldg. Room 6144  
12<sup>th</sup> St. and Pennsylvania Ave, N.W.  
Washington, DC 20004

Re: Annual Report Revision  
Eurecat U.S. Incorporated  
13100 Baypark Road  
Pasadena, TX 77507  
EPA ID No.: TXD106829963

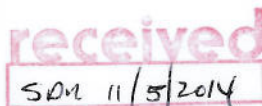
Dear Sir or Madam:

**This is a revision of our Annual Report of Hazardous Waste Exports originally submitted to the above on February 28, 2014. The revision is provided to correct an accounting error discovered for the total lbs of waste exported. We originally reported that we had shipped 218,090 lbs but in our response to a routine Annual Waste Summary review inquiry by the Texas Commission on Environmental Quality (TCEQ) we discovered that a transposition and omission error were inadvertently made during the process of entering manifest data into the state's online reporting system. The correct amount shipped was actually 226,144 lbs as reported to TCEQ following this discovery. The revised value has been corrected in the report below and this is the only change to our initial report.**

Eurecat U.S. Incorporated acted as a primary exporter in 2013 which is the period covered in this letter. This letter is offered to satisfy the Annual Report requirement applicable to primary exporters in

**EURECAT U.S. INCORPORATED**

1331 Gemini, Suite 310  
Houston, TX 77058  
Phone: 281.218.0669  
[www.eurecat.com](http://www.eurecat.com)



accordance with Title 40 Code of Federal Regulations §262.56 Annual Reports. Eurecat shipped hazardous waste to the following consignee:

Eurecat France SAS  
Quai Jean Jaures – BP No. 45  
07800 La Voulte-sur-Rhone, France

Information requested from §262.56 (a)(4)

Eurecat France SAS-

SPENT CATALYST CONTAINING Ni, NiW, NiCoMo, Cu/Zn, Cu, Pt, and Pd (EPA hazardous waste numbers K171) FOR VALORIZATION, DOT Hazard Class: 4.2, Name: Waste Self-heating solid, inorganic, n.o.s., Transporter ID: TXR000018317, Total Amount of Waste Shipped: 226,144 lbs in one shipment relative to our single notification. This waste was exported for metals reclamation.

40 CFR §262.56 (5)(i) and (ii),

The volume and toxicity of waste managed and generated by Eurecat U.S. Incorporated is a direct relationship with the volume and toxicity of the waste sent to Eurecat as a commercial waste management facility. This is documented in our in our most current annual Source Reduction and Waste Minimization Plan and Annual Report acknowledged by Texas Commission on Environmental Quality on July 9, 2013. As explained in our Source Reduction and Waste Minimization Plan and annual updates, as a recycling facility the amount of hazardous waste Eurecat generates is a direct function of the amount of industrial and hazardous waste Eurecats' customers send to us to process. On average, we generate as new waste from our material processing, approximately 2%-5% of the total wastes received. We return the remainder to the market as mostly recycled product. Materials that are not deemed suitable for regeneration after Eurecat's on-site evaluation but are recyclable materials may be managed as wastes for further reclamation. Eurecat only generates and stores hazardous and nonhazardous waste. Eurecat does not treat or dispose of any wastes on site. Eurecat has been receiving the same types of spent catalyst wastes since its inception in 1984.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Sincerely,  
Eurecat U.S. Incorporated



Burch Estes, *on behalf of primary exporter*  
HSE Director

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From: (281) 474-3076  
 Bobbett Wilkerson  
 EURECAT US  
 13100 BAY PARK RD  
 PASADENA, TX 77507

Origin ID: HBYA



Ship Date: 03NOV14  
 ActWgt: 0.5 LB  
 CAD: 3177337/NET3550

Delivery Address Bar Code



Ref # letter for HSE Burch Es.  
 Invoice #  
 PO #  
 Dept #

SHIP TO: (282) 272-0167

BILL SENDER

Attn: Robert Heiss, Director  
 Office of Enforcement and Compliance  
 1200 PENNSYLVANIA AVE NW

WASHINGTON, DC 20460

TUE - 04 NOV 10:30A  
 PRIORITY OVERNIGHT

TRK# 7717 2211 5928  
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